

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PENSION FUND OF CEMENT)	
MASONS' UNION LOCAL UNION NO.)	
502 <i>et al.</i> ,)	
)	Case No. 20-cv-1024
Plaintiffs,)	
)	Judge Robert W. Gettleman
vs.)	
)	Magistrate Judge Susan E. Cox
R & W CLARK CONSTRUCTION INC.,)	
an Illinois Corporation, and RICHARD)	
CLARK, an individual,)	
)	
Defendants.)	

**PAUL M. BAUCH, KENNETH A. MICHAELS JR., & CAROLINA Y. SALES'
MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANTS**

Paul M Bauch, Kenneth A. Michaels Jr., and Carolina Y. Sales of the law firm of Bauch & Michaels, LLC (collectively, the "Movants") respectfully move this Court to enter an order granting them leave to withdraw as counsel for defendants R&W Clark Construction, Inc. and Richard W. Clark (collectively, the "Defendants"). In support of this Motion, the Movants state as follows:

1. On March 25, 2020, the Movants filed appearances on behalf of the Defendants.
2. The Movants are seeking leave to withdraw pursuant to N.D. Ill. L.R. 83.17; 83.50; and Ill. R. Prof'l Conduct (2010) R. 1.16(b)(5) (eff. Jan. 1, 2010), which provides that a lawyer may withdraw from representing a client if the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and

has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled.

WHEREFORE, the Movants respectfully request that this Court enter an order granting them leave to withdraw as counsel for R&W Clark Construction, Inc. and Richard W. Clark.

Dated: August 26, 2021

PAUL M. BAUCH, KENNETH A.
MICHAELS, JR., & CAROLINA Y.
SALES

By: s/ Paul M. Bauch
One of Their Attorneys

Paul M. Bauch (ARDC #6196619)
Kenneth A. Michaels Jr. (ARDC #6185885)
Carolina Y. Sales (ARDC #6287277)
BAUCH & MICHAELS, LLC
53 West Jackson Boulevard, Suite 1115
Chicago, IL 60604
Phone: 312-558-5000
Fax: 312-427-5709
pbauch@bmlawllc.com
kmichaels@bmlawllc.com
csales@bmlawllc.com